

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: SHERONDA TUCKER
JIMMY TUCKER**

CHAPTER 13

DEBTORS

CASE NO. 23-11270 JDW

**RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC
STAY AND FOR ABANDONMENT OF REAL PROPERTY [DKT. #13]**

COME NOW, Sheronda Tucker and Jimmy Tucker, Debtor, by and through their attorney of record, and files this response to the motion filed by Ronald C. Anderson (“Creditor”), and would respectfully state unto the Court as follows, to-wit:

1. The Debtors’ admit the allegations contained in Paragraph 1.
2. The Debtors’ admit the allegations contained in Paragraph 2.
3. The Debtors’ admit the allegations contained in Paragraph 3.
4. The Debtors’ admit the allegations contained in Paragraph 4.
5. The Debtors’ deny the allegations contained in Paragraph 5 and would request proof of the same. According to documents obtained from Creditor around December of 2022, the Debtors were only \$6,000.00 delinquent.

6. The Debtors’ deny the allegations contained in Paragraph 6.
7. The Debtors’ deny the allegations contained in Paragraph 7.
8. The Debtors’ deny the allegations contained in Paragraph 8.
9. The Debtors’ deny the allegations contained in the Paragraph beginning “WHEREFORE, PREMISES CONSIDERED”, and continuing to the end of the motion.

WHEREFORE, PREMISES CONSIDERED, Debtor requests that this Honorable Court will deny the motion filed herein by Bridgforth, Buntin & Emerson, PLLC on behalf of Ronald C. Anderson, filed herein and for such other, further and general relief to which the Debtors may be entitled.

Respectfully Submitted, this the 31st day of May, 2023

/s/Robert H. Lomenick
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ROBERT H. LOMENICK, JR., MSB 104186
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CERTIFICATE OF SERVICE

I, Robert H. Lomenick, attorney for Debtor(s), do hereby certify that I have this day forwarded by electronic means or via United States Mail, postage prepaid, of the above and foregoing Response to the following:

Bridgforth, Buntin, & Emerson, PLLC
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Attorney for Ronald C. Anderson

United States Trustee
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Jackson, Mississippi 39201

Ms. Locke D. Barkley
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Dated: May 31, 2023

/s/Robert H. Lomenick
ROBERT H. LOMENICK, JR.